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Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOSEPH VASTOLA,

Plaintiff,

v.

STERLING, INC. d/b/a SIGNET JEWELERS; ARIEL GORE, both ' individually and in capacity as a supervisor with! Sterling, Inc. d/b/a Signet! Jewelers; JANE DOE I-V (these ! names being fictitious as! their present identities are! unknown); JOHN DOE I-V (these! names being fictitious their present identities are ! unknown); XYZ CORPORATION I-V; (these names being fictitious as their present identities are unknown)

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: SOMERSET COUNTY

Case No. 3:21-cv-14089

State Court

Docket: SOM-L-841-21

Civil Action

PLAINTIFF'S MOTION TO REMAND
THIS MATTER TO STATE COURT
AND FOR ATTORNEYS' FEES
PURSUANT TO 28 U.S.C. § 1447

TO: August W. Heckman, II, Esq.
Rudolph J. Burshnic, Esq.
Morgan, Lewis & Bockius, LLP
502 Carnegie Center
Princeton, NJ 08540

## COUNSEL:

PLEASE TAKE NOTICE that on Tuesday, September 7, 2021 at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may

be heard, the undersigned, attorneys for plaintiff, shall apply to the United States District Court, District of New Jersey, for an Order remanding this matter to State Court and for attorneys' fees pursuant to 28 U.S.C. § 1447.

PLEASE TAKE FURTHER NOTICE that plaintiff will rely upon the Brief and Affidavit of Counsel submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

O'CONNOR, PARSONS, LANE & NOBLE, LLC Attorneys for Plaintiff

By:

ROBERT A. BALLARD, III

DATED: August 5, 2021